

<b>UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY</b> Caption in Compliance with D.N.J. LBR 9004-1(b)	
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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

In re:	)	
	)	
LTL MANAGEMENT LLC,	)	Lead BK Case: 23-12825-MBK
	)	
Debtor.	)	

**AD HOC GROUP OF MESOTHELIOMA CLAIMANTS' MOTION TO DISMISS  
THE SECOND BANKRUPTCY PETITION OF LTL MANAGEMENT**

The Ad Hoc Group Mesothelioma Claimants,<sup>1</sup> through undersigned counsel and pursuant to Section 1112(b) of the Bankruptcy Code and Rule 9011 of the Bankruptcy Rules, respectfully moves this Court to Dismiss LTL Management's Petition. In support of this Motion, the Ad Hoc Group adopts and incorporates by reference all the arguments advanced in the Motion to Dismiss filed by the Official Committee of Talc Claimants (Dkt. 286-1).

Respectfully submitted:

**MAUNE RAICHLE HARTLEY  
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/s/ Clayton L. Thompson

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<sup>1</sup> The Ad Hoc Group is composed of claimants Katherine Tollefson, Evan Plotkin and Giovanni Sosa (all appellants to the Third Circuit in *LTL1*), joined in this Request by Sandra Weathers, Mary Jackson, Elizabeth Meikle, Marzena Zachara, Robert Radin, and Christine Woodfin, all mesothelioma claimants.

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